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Ms. Marlene Dortch

Secretary

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RE: Docket 94-102

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Dear Ms. Dortch:

This is to inform the Commission that APCO International President Wanda McCarley, Second Vice-president Richard Mirgon, and the undersigned, met with Chairman Kevin Martin and Commissioner Robert McDowell on May 16, 2007, to discuss APCO's pending Request for Declaratory Ruling in this proceeding. We reiterated our view that location accuracy under the Commission's wireless E9-1-1 rules should be measured at the PSAP level.

We also indicated in the meetings that, if the Commission determines that it must address this issue through a notice of proposed rulemaking, the proceeding should be conducted in an expedited fashion. A final decision defining PSAP service area as the relevant area of measurement for wireless E9-1-1 accuracy should be adopted quickly, and well in advance of other E9-1-1 issues that require more extended consideration. Specifically, on the PSAP-level accuracy question, we recommend a very brief comment period (e.g., 14 days for comments and 7 days for replies) and a rapid Commission order on that issue (e.g., within 21 days). We have no specific recommendation at this time regarding an appropriate comment period for the other issues to be considered.

Please contact the undersigned should the Commission require any additional information regarding this matter.

Respectfully submitted,

Robert M. Gurss

Director of Legal and Government Affairs

cc: Derek Poarch
~~Dan~~ Gonzalez
Angela Giancarlo
Erika Olson